



September 17, 2012

Ms. Kimberly Tisa
PCB Coordinator
U.S. Environmental Protection Agency Region 1
5 Post Office Square – Suite 100
Boston, Massachusetts 02109-3912

Re: PCB Soil Remediation Final Completion Report
Anderson and Upton Halls
University of Southern Maine - Gorham, Maine

Dear Ms. Tisa:

On behalf of the University of Southern Maine (USM), Woodard & Curran has prepared this PCB Soil Remediation Final Completion Report to document the remediation of PCB-impacted soils located adjacent to two buildings, Anderson Hall and Upton Hall, at the USM campus in Gorham, Maine. The remediation was completed in accordance with the January 19, 2012 PCB Soil Remediation Plan / Modification Request, which was submitted in accordance with Condition 20 of the U.S. Environmental Protection Agency's (EPA's) June 29, 2011 PCB Cleanup and Disposal Approval under 40 CFR 761.61(a) and (c) and 761.79(h). The Modification Request was approved by EPA (with conditions) on March 29, 2012.

If you have any comments, questions, or require further information, please do not hesitate to e-mail or call me at the number listed above.

Sincerely,

WOODARD & CURRAN INC.

Jeffrey Hamel, LSP, LEP
Senior Vice President

Project Number 224164

Enclosure(s)

cc: Carol Potter, USM
Chip Gavin, University of Maine System
Nick Hodgkins, MEDEP



PCB SOIL REMEDiation FINAL COMPLETION REPORT

**University of Southern
Maine**

**Anderson & Upton Halls
Gorham, Maine**

woodardcurran.com
COMMITMENT & INTEGRITY DRIVE RESULTS

Project No. 224164

USM Gorham

September 2012

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1. INTRODUCTION

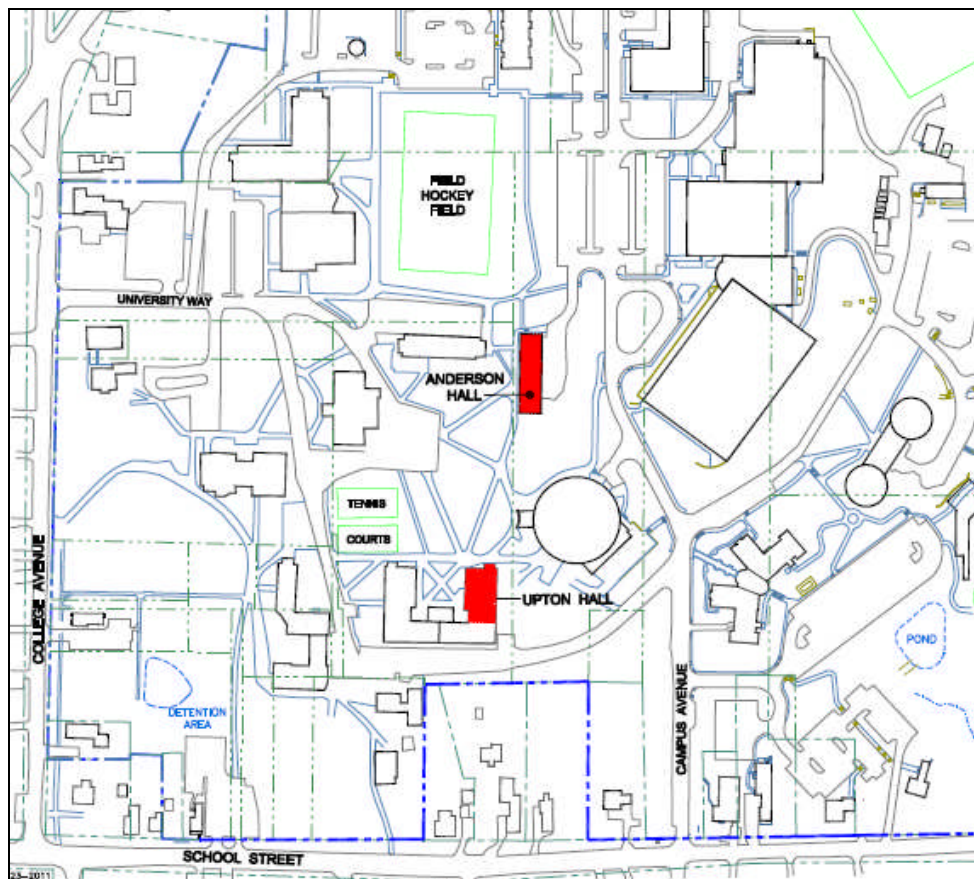
Woodard & Curran, Inc. has prepared this Final Completion Report on behalf of the University of Southern Maine (USM) for the remediation of soils impacted by polychlorinated biphenyls (PCBs) at Anderson Hall and Upton Hall, both located on the USM campus in Gorham, Maine (the Site). The remediation was completed in accordance with the January 19, 2012 PCB Soil Remediation Plan / Modification Request, which was submitted in accordance with Condition 20 of the U.S. Environmental Protection Agency's (EPA's) June 29, 2011 PCB Cleanup and Disposal Approval under 40 CFR 761.61(a) and (c) and 761.79(h). The Modification Request was approved by EPA (with conditions) on March 29, 2012. The Approval has been included as Appendix A to this Report.

The soil removal activities were conducted over the Summer session at the University and this Report documents the PCB-impacted soil excavation activities, which were completed in June and July 2012.

1.1 SITE DESCRIPTION

Anderson Hall is located at 40 Campus Ave and Upton Hall is located at 52 University Way at the center of the USM campus in Gorham. Both buildings are used primarily as residence halls for undergraduate students. The buildings were originally constructed in 1958 (Upton Hall) and 1962 (Anderson Hall), and are constructed mainly of brick masonry on concrete foundations. Surrounding ground surfaces are flat to gently sloped and consist of asphalt walkways or grass-covered soils. A campus map of the surrounding area is provided as Figure 1-1 below.

Figure 1-1: Campus Map



1.2 SITE BACKGROUND

Certain joint caulking used as part of standard construction practices for masonry buildings and concrete structures erected between the 1950s and late 1970s is known to have been manufactured with PCBs. PCBs were added to caulking for durability, resistance to degradation, and as a softener/plasticizer for application. Due to the porous nature of concrete and other masonry surfaces, PCBs in caulking may penetrate into adjacent materials during application or over time, may leach or weather, and/or may be disturbed during renovations or other work. Production and approved usage of PCBs was halted in the United States in the late 1970s. As indicated above, Anderson and Upton Halls were constructed during this time period.

In preparation for the Anderson and Upton Hall renovations performed in 2011 and based on the date of building construction, caulking materials within the scheduled work areas were inspected and inventoried, and representative samples were collected for PCB analysis. Analytical results indicated that some caulking materials contained PCBs at concentrations greater than 50 parts per million (ppm). Based on these results, adjacent building materials and soils were sampled to determine whether PCBs had migrated from the caulking into these adjacent materials. Detectable concentrations of PCBs were reported in both adjacent building materials and surrounding soils.

PCB-containing building materials encountered during recent renovation activities were remediated in 2011 in accordance with the Notification as described in the Final Completion Report prepared for the buildings and submitted to EPA on January 9, 2012.

A plan to remediate soils identified with PCBs > 1 ppm adjacent to Anderson and Upton Halls was submitted to EPA on January 19, 2012 (the Soil Remediation Plan). As described in the plan, based on the concentration and distribution of PCBs detected in adjacent soils, it was apparent that the caulking used in original building construction was the source of PCBs. In general, concentration gradients identified in the surrounding soils demonstrated a reduction in total PCBs with increasing distance from the building. Under 40 CFR 761, site soils identified with PCBs > 1 ppm were proposed to be managed for off-site disposal as PCB Remediation Waste. Achievement of the 1 ppm cleanup level under 40 CFR 761 would also result in achievement of the 2.4 ppm criteria set forth by the Maine Department of Environmental Protection in the Maine Remedial Action Guidelines for Soil Contaminated with Hazardous Substances (MERAGs; January 13, 2010).

1.3 PROJECT TEAM

The remediation project team consisted of the following parties:

- University of Maine System – Owner (acting through University of Southern Maine);
- Woodard & Curran – Environmental Consultant (PCB remediation);
- Gorham Sand and Gravel (GSG) – Remediation Subcontractor (site preparation, soil removal, and backfill);
- Enpro Services Inc. (Enpro) – Remediation Subcontractor (off-site soil transportation and disposal); and
- Analytics Environmental Laboratory (soil sample analysis).

2. SOIL REMOVAL

This section describes the PCB cleanup and disposal activities conducted to address soils containing PCBs > 1 ppm. The objective of the remedial approach was to properly remove and dispose off-site PCB-impacted soils such that remaining soils met unrestricted use criteria (i.e., PCBs \leq 1 ppm). The soil remediation work described in this section was performed to satisfy the conditions of EPA's Approval as well as requirements of 40 CFR 761.61, and was conducted in accordance with the January 2012 Soil Remediation Plan.

2.1 REMEDY OVERVIEW

In general, the remedial approach for PCB-impacted soil consisted of the following activities:

- Removal and off-site disposal of PCB-impacted soil as PCB Remediation Waste per 40 CFR 761.61;
- Collection of verification samples for analyses;
- Site restoration; and
- Recordkeeping and reporting.

Drawings depicting the sample locations described in this section are provided as Figures 2-1 and 2-2 (Final Limits of Excavation with Verification Sample Locations for Anderson and Upton Halls, respectively). The table presenting the laboratory analytical data is provided as Table 2-1 (Soil Verification Summary).

2.1.1 Site Preparation and Controls

Prior to initiating the soil excavation, site controls were implemented as described in Section 3.1 of the Soil Remediation Plan. These preparations included contracting Dig Smart to mark out subsurface utilities in the area, securing marked boundaries around the proposed excavation areas and managing controlled access points, and the use of proper personal protective equipment. Air monitoring was performed during excavation activities, as described in Section 2.4 of this report. Air monitoring results indicated that water misting during excavation was not necessary, as no visible dust or recorded exceedances of the total airborne particulate action limit occurred during the work.

2.1.2 Methods

Soil removal areas were marked and confirmed by Woodard & Curran prior to beginning excavation. Soil excavation was performed using primarily a backhoe loader. Hand shovels were also used in areas that could not be accessed with the backhoe loader. Soils were live-loaded from the excavation areas into lined roll-off containers staged adjacent to the excavation. Upon filling a container, the liner was sealed and the container was covered for temporary on-site staging until off-site shipment.

Upon achieving the proposed excavation depth in a given area, post-excavation verification samples were collected at the base of excavation, from a depth of 0-3 inches below the excavation base. Verification samples were collected on a 10-foot grid as shown on Figures 2-1 and 2-2, including the additional locations requested by EPA in their March 29, 2012 approval. If initial verification sample results indicated that PCB concentrations were \leq 1 ppm, the removal was considered complete. If initial verification sample results indicated that PCB concentrations remained above 1 ppm, additional soil removal (12 inches) was conducted and additional verification sampling was performed at an off-set grid (1-foot north and 1-foot east from the original sampling point) until results confirmed that residual PCB levels were \leq 1 ppm. In cases where additional removal was performed, each sample's area of inference extended to a

point halfway between samples (i.e., halfway between the point reported with PCBs > 1 ppm and the nearest point reported ≤ 1 ppm).

Samples were transferred on ice to Analytics Environmental Laboratory of Portsmouth, New Hampshire under standard chain of custody procedures. Samples were extracted using USEPA Method 3540C (Soxhlet extraction) and analyzed for PCBs using USEPA Method 8082. Electronic versions of the laboratory analytical packages for the data presented in this section are provided in Appendix B.

2.2 SOIL REMOVAL AND VERIFICATION

The soil removal work was conducted by Gorham Sand & Gravel of Buxton, Maine. Ambient air monitoring and verification soil sampling activities were conducted by Woodard & Curran. Soil sampling locations are shown on Figures 2-1 and 2-2. Soil removal activities began on June 20, 2012 and were completed on July 9, 2012 as summarized below.

2.2.1 Supplemental Verification Sampling

As discussed via email on March 29, 2012 in support of the Soil Remediation Plan, EPA requested additional verification samples in specific areas where the PCB vertical limits had not been clearly established. These areas included the following:

- Anderson Hall: Former sampling location 069/108/109, shown on Figure 2-1 of the 2012 Soil Remediation Plan (verification sample location 160).
- Anderson Hall: Former sampling location 107 (Figure 2-1 of the 2012 Soil Remediation Plan) from the sidewall (verification sample location 161).
- Upton Hall: Former sampling location 120, shown on Figure 2-2 of the 2012 Soil Remediation Plan (verification sample location 134).

These three supplemental verification samples were added to the Soil Remediation Plan and collected as part of the verification program as described below.

2.2.2 Excavation and Verification

Approximately 80 cubic yards of PCB-impacted soils were proposed for cleanup and disposal around portions of the building perimeters. Initial proposed excavation depths ranged from 12 to 24 inches below ground surface (bgs).

The sequence of excavation work is presented below. A summary of the verification data is presented as Table 2-1, and the final excavation depths and verification samples are depicted graphically on Figures 2-1 (Anderson Hall) and 2-2 (Upton Hall).

- Excavation work was conducted at the northwest corner of Upton Hall on June 20, 2012 to approximately 12 inches bgs. Excavation was considered complete at this location after a single round of excavation as verification sampling conducted in this area confirmed that remaining soils contained PCBs ≤ 1 ppm.
- Excavation work was conducted using hand shovels around the concrete pad in the northwest corner of Anderson Hall on June 20, 2012 to approximately 12 inches bgs. Excavation was considered complete for

this area of Anderson Hall after a single round of excavation since verification sampling conducted in this area confirmed that remaining soils contained PCBs ≤ 1 ppm.

- Excavation work began at the southeastern corner of Anderson Hall on June 20, 2012 to approximately 12 inches bgs. After collecting verification samples and review of the data, an additional 12 inches of soil was removed on July 9, 2012 at three locations initially reported with PCBs > 1 ppm (see Table 2-1 and Figure 2-1). Subsequent re-sampling of these areas confirmed that PCBs were ≤ 1 ppm after the additional removal.
- Excavation work began at the southwestern corner of Anderson Hall on June 21, 2012 to approximately 12 or 24 inches bgs as proposed in the Plan, with the exception of a limited area depicted on Figure 2-1 where a concrete electrical conduit was encountered at 10 inches bgs along the eastern side of the excavation. The conduit did not interfere with any proposed verification sample locations. After collecting verification samples and review of the data, an additional 12 inches of soil was removed on July 9, 2012 at two locations initially reported with PCBs > 1 ppm. Subsequent re-sampling of this area confirmed that PCBs were ≤ 1 ppm after the additional removal.

The verification data included a total of 32 initial primary soil samples collected after the first round of excavation. One round of additional soil removal was conducted at Anderson Hall to remove an additional 12 inches of soil at five locations, with five additional samples collected as shown on Figure 2-1.

The maximum depth of excavation at any location was 24 inches. The total area subject to removal and off-site disposal of PCB-impacted soils measured approximately 1,635 square feet. Approximately 71% of the area (1,166 square feet) was excavated to a depth of 12 inches bgs (or 10 inches bgs at the electrical conduit) and 29% of the area (468 square feet) was excavated to a depth of 24 inches bgs.

The in-place volume of soils excavated from the Site totaled approximately 78 cubic yards based on the excavation area (1,635 square feet) and known excavation depths in each area as shown on Figures 2-1 and 2-2. This 78 cubic yard volume is consistent with the 80 cubic yards estimated in the January 2012 Soil Remediation Plan. Given the density of soils and slight volumetric expansion expected upon removal from the ground, this value is consistent with the total weight of soils (133.71 tons) as reported by the disposal facility.

2.3 WASTE STORAGE AND DISPOSAL

Storage and disposal activities were completed in accordance with the procedures outlined in Section 3.5 of the January 2012 Soil Remediation Plan. Soils and other PCB remediation wastes generated in association with removal activities (e.g., polyethylene sheeting, PPE, etc.) were placed in secure, lined, covered, and marked roll-off waste containers staged adjacent to the excavation area. The PCB wastes were managed in accordance with 40 CFR 761.65 and marked in accordance with 40 CFR 761.40. Open or active excavation areas were marked throughout the duration of the work activities, and the work site was enclosed by perimeter chain-link fencing during non-work hours.

Filled roll-off containers or trailers were transported off-site by Enpro of Newburyport, Massachusetts. All soils were classified as non-hazardous waste (< 50 ppm PCBs) and were transported to the Turnkey Recycling and Environmental Enterprises (TREE) non-hazardous waste disposal facility in Rochester, New Hampshire. A copy of the non-hazardous waste profile sheet approved by the disposal facility is included in Appendix C. The soil was sent off-site in eight shipments between June 20, 2012 and July 9, 2012 with a total disposal weight of 133.71 tons of soils.

Pursuant to Section 3.6 (Recordkeeping and Reporting) of the Soil Remediation Plan, copies of all waste shipment records are provided in Appendix C of this Report.

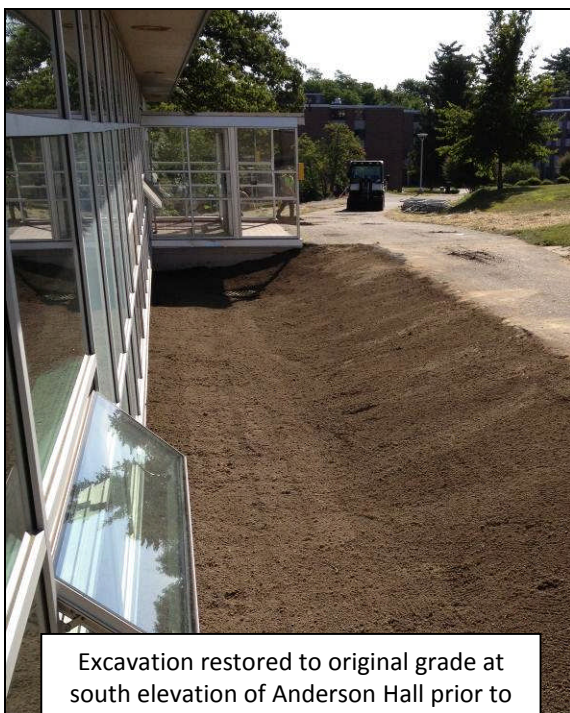
2.4 AIR MONITORING

Air monitoring was conducted in accordance with the perimeter air monitoring plan included in Appendix B to the January 2012 Soil Remediation Plan. Monitoring was conducted at a frequency of one reading per hour of soil excavation. At each hour, a reading was recorded from the work zone perimeter. The location of the work zone perimeter and dust reading stations changed throughout the day as the excavation progressed. Readings were collected over 30-second intervals at each location using a Thermo MIE Personal Data RAM Model PDR-1000 monitor. Prior to any dust generating activities and periodically during the project, air monitoring readings were recorded to document airborne particulate matter concentrations at background locations elsewhere on-site.

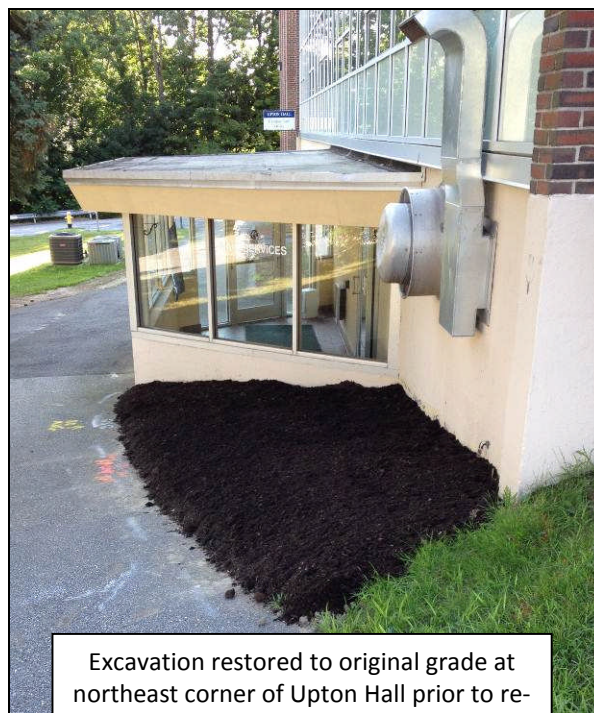
There were no exceedances of the total airborne particulate action limit (0.1 milligrams per cubic meter (mg/m³) above background) during any soil removal activities. In general, the total airborne particulate levels measured at locations around the work area perimeter were typically at background levels, with some variation in readings slightly above and slightly below background levels. A table summarizing the air monitoring data is provided in Appendix D of this report.

2.5 SITE RESTORATION

Following completion of the removal activities and verification that the cleanup levels had been met, the excavation areas were backfilled to its original grade with clean imported fill material and topsoil from a licensed source.



Excavation restored to original grade at south elevation of Anderson Hall prior to re-seeding (July 19, 2012)



Excavation restored to original grade at northeast corner of Upton Hall prior to re-seeding (July 19, 2012)

2.6 DATA QUALITY ASSESSMENT

A data quality and data usability assessment has been conducted to review the 37 samples collected in support of the remediation and verification activities. Data validation and review was conducted by a third-party validator, Data Check, Inc. of New Durham, New Hampshire. This review included a check of field documentation including sample

collection and preservation methods, a check of the laboratory data and documentation, a review of the internal laboratory QA/QC procedures and results including surrogate recoveries, blank results, matrix spike (MS) and matrix spike duplicate (MSD) results, laboratory control standard (LCS) and laboratory control standard duplicate (LCSD) results, and an evaluation of sample holding times. The assessment was performed in general conformance with EPA Region I Guidelines and the Quality Control Guidelines. Data Check's data validation summary is provided in Appendix E.

A summary of the data usability assessment for the data is presented below:

- Representativeness of the data was evaluated qualitatively utilizing site information and sampling data. Samples were extracted and analyzed within allowable holding times. Consistent procedures and laboratory analysis of the data were achieved. Sample containers were packed on ice and were accompanied by complete chain of custody forms from the time of sample collection until laboratory delivery. PCBs were not detected in the laboratory method blank analyses, indicating that there were no interferences introduced at the laboratory during sample analysis.
- One field equipment blank sample was collected and submitted to the laboratory as part of the field QA/QC procedures. The blank sample was non-detect for PCBs, and no qualifications were applied to the data.
- Certain sample results were qualified as estimated (J) if the RPD between the column results was outside of the acceptance criteria ($< 25\%$). Regardless of the RPD between the column results, the laboratory reports the higher of the two column results. Four samples were qualified as estimated based on column RPD $\geq 25\%$; these qualifiers are included in the summary tables provided with this report.
- Accuracy of the analytical data was assessed by reviewing MS/MSD, LCS/LCSD, and surrogate recoveries. The MS/MSD recoveries, LCS/LCSD recoveries, and PCB surrogates met acceptance criteria for all data sets, and no qualifiers were applied to the data.
- Some samples were analyzed at dilutions due to the high concentration of PCBs present in the samples and/or due to sample matrix. Elevated quantitation limits were reported in these samples as a result of the dilutions performed.
- The data packages were reviewed to ensure that all sample and associated quality assurance results were available. The completeness review indicated that all samples were analyzed and all quality control results were available to complete the data validation process.

Based on this review, the data adequately represents the materials tested, and the samples collected are considered usable for the purposes of characterizing PCB-affected media and verifying remediation efforts in accordance with 40 CFR Part 761.

3. SUMMARY AND CONCLUSIONS

Soils identified as PCB Remediation Waste containing PCBs > 1 ppm at locations adjacent to Anderson and Upton Halls on the University of Southern Maine campus in Gorham, Maine were removed for off-site disposal in June and July of 2012. The work included the excavation and off-site disposal of 133.71 tons of PCB impacted soils in eight roll-off containers. The soil was classified as non-hazardous waste (< 50 ppm PCBs) and was transported to the TREE non-hazardous waste disposal facility in Rochester, New Hampshire. Soils remaining on-site were confirmed to contain PCBs \leq 1 ppm as demonstrated by the verification sampling data presented herein.

The PCB remediation activities described in this Report have been performed in accordance with the Notification and the conditions of EPA's Approval. No further work is warranted to meet the conditions of the Approval.

4. REFERENCES

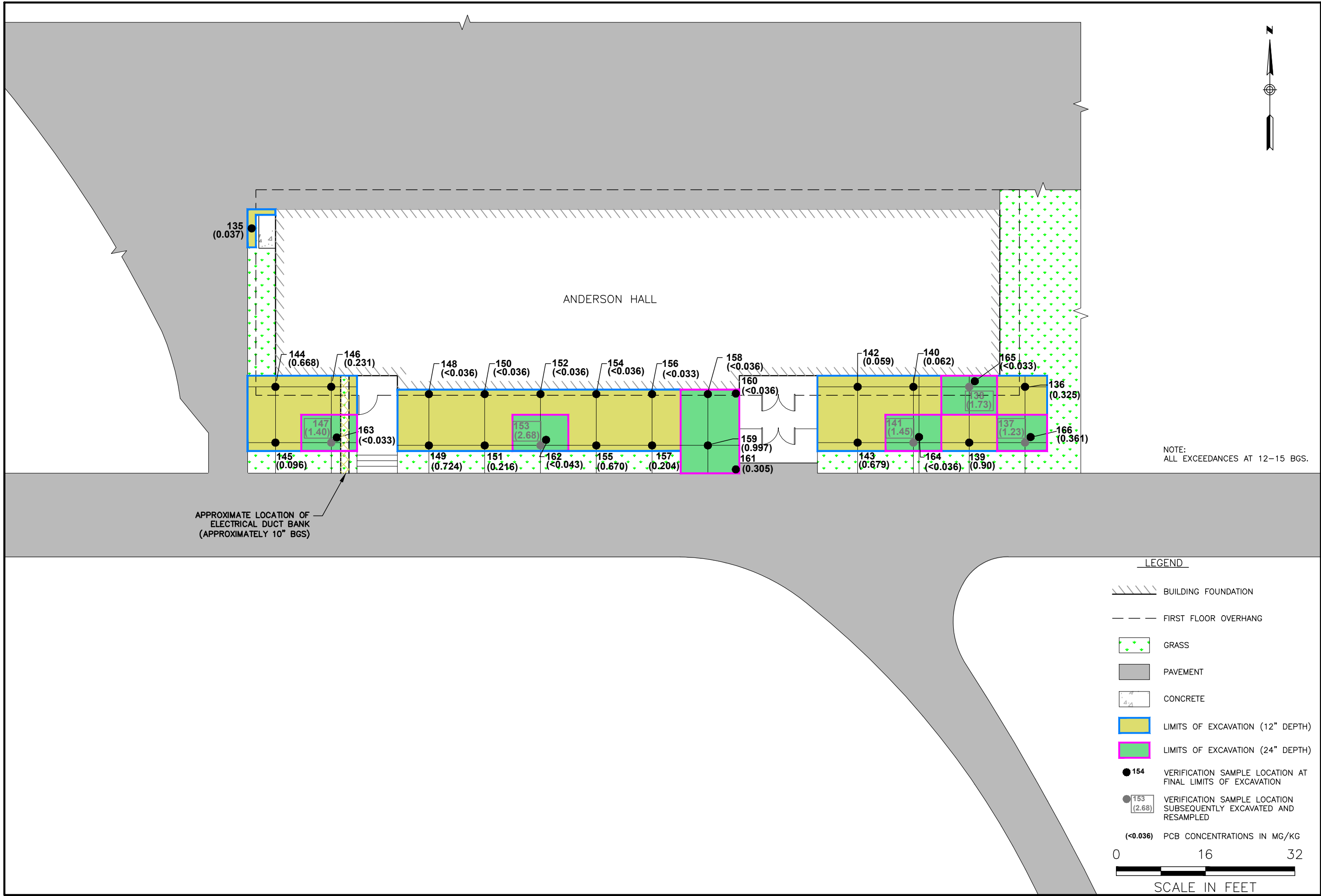
- United States Environmental Protection Agency (EPA), 2011. PCB Cleanup and Disposal Approval under 40 CFR 761.61(a) and (c) and 761.79(h), Anderson and Upton Halls, University of Southern Maine, Gorham, Maine. June 29.
- U.S. EPA, 2012. Modification Approval (via email) *RE: USM Gorham – PCB Remediation – Soil Remediation Modification Request*. March 29.
- Woodard & Curran, Inc., 2011a. PCB Remediation Plan, Anderson and Upton Halls. March 18.
- Woodard & Curran, Inc., 2011b. Response to EPA Comments, Anderson and Upton Halls. June 8.
- Woodard & Curran, Inc., 2012. Modification #1, Soil Remediation Plan, Anderson Hall & Upton Hall, University of Southern Maine. January 19.
- Woodard & Curran, Inc., 2012. Response to EPA Comments (via email) *RE: USM Gorham – PCB Remediation – Soil Remediation Modification Request*. March 29.

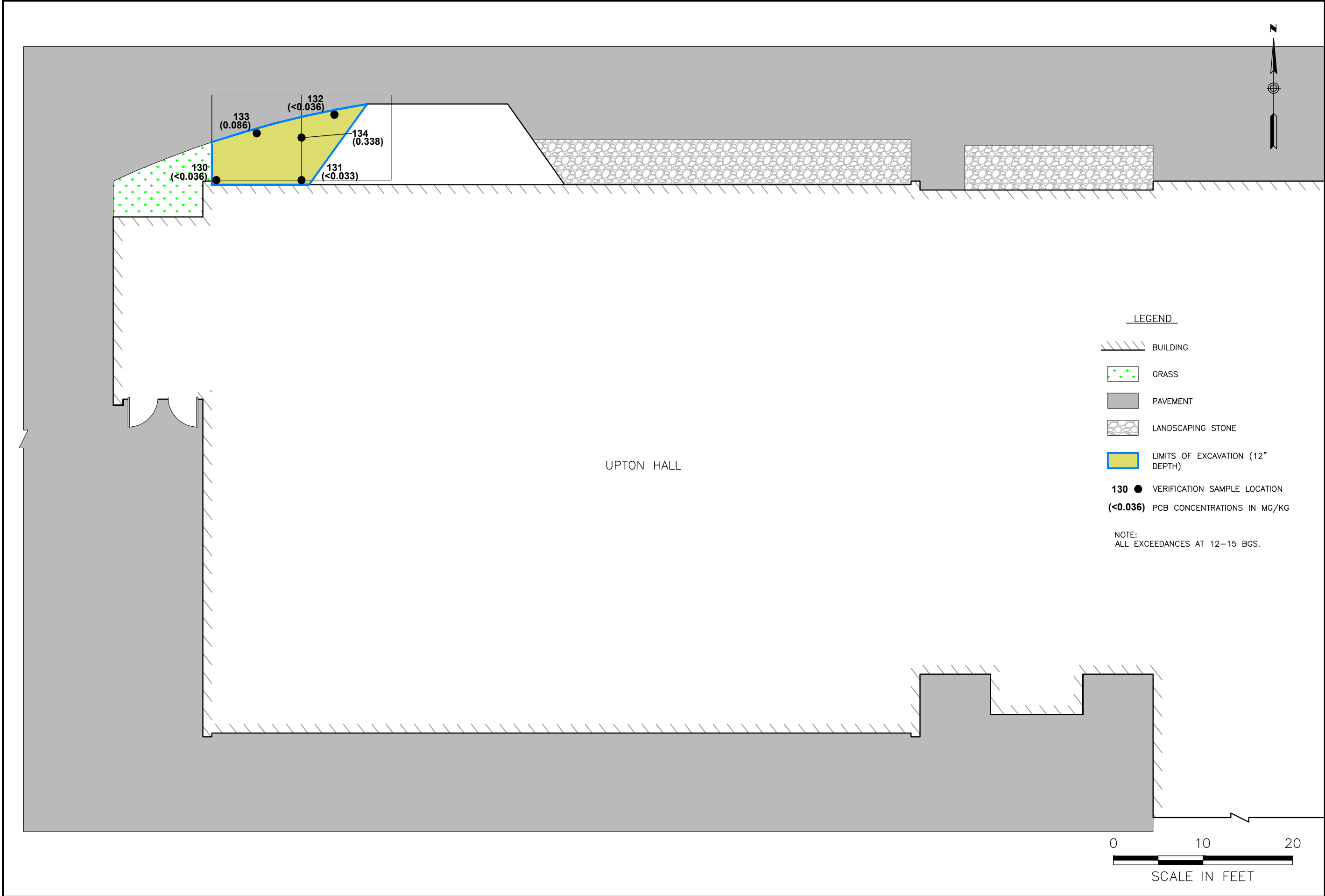
Table 2-1
Soil Verification Summary - Anderson & Upton Halls
University of Southern Maine - Gorham

Location	Sample Date	Sample Depth (inches)	Façade	Sample ID	Reporting Limit	Total PCBs	Qualifier
Anderson Hall	06/20/12	12-15	West	AH-CBS-135	0.033	0.037	
	06/20/12	12-15	South	AH-CBS-136	0.033	0.325	
	06/20/12	12-15	South	AH-CBS-137	0.083	1.23	
	07/09/12	24-27	South	AH-CBS-166	0.036	0.361	
	06/20/12	12-15	South	AH-CBS-138	0.165	1.73	
	07/09/12	24-27	South	AH-CBS-165	0.033	ND	
	06/20/12	12-15	South	AH-CBS-139	0.040	0.90	
	06/20/12	12-15	South	AH-CBS-140	0.036	0.062	
	06/20/12	12-15	South	AH-CBS-141	0.073	1.45	
	07/09/12	24-27	South	AH-CBS-164	0.036	ND	
	06/20/12	12-15	South	AH-CBS-142	0.033	0.059	
	06/20/12	12-15	South	AH-CBS-143	0.043	0.679	
	06/21/12	12-15	South	AH-CBS-144	0.033	0.668	
	06/21/12	12-15	South	AH-CBS-145	0.036	0.096	
	06/21/12	12-15	South	AH-CBS-146	0.033	0.231	
	06/21/12	12-15	South	AH-CBS-147	0.076	1.40	
	07/09/12	24-27	South	AH-CBS-163	0.033	ND	
	06/21/12	12-15	South	AH-CBS-148	0.036	ND	
	06/21/12	12-15	South	AH-CBS-149	0.036	0.724	
	06/21/12	12-15	South	AH-CBS-150	0.036	ND	
	06/21/12	12-15	South	AH-CBS-151	0.036	0.216	J
	06/21/12	12-15	South	AH-CBS-152	0.036	ND	
	06/21/12	12-15	South	AH-CBS-153	0.165	2.68	
	07/09/12	24-27	South	AH-CBS-162	0.043	ND	
	06/21/12	12-15	South	AH-CBS-154	0.036	ND	
	06/21/12	12-15	South	AH-CBS-155	0.033	0.670	
	06/21/12	12-15	South	AH-CBS-156	0.033	ND	
	06/21/12	12-15	South	AH-CBS-157	0.033	0.204	
	06/21/12	24-27	South	AH-CBS-158	0.036	ND	
	06/21/12	24-27	South	AH-CBS-159	0.036	0.997	
	06/21/12	24-27	South	AH-CBS-160	0.036	ND	
	06/21/12	0-24	South	AH-CBS-161	0.036	0.305	J
Upton Hall	06/20/12	12-15	North	UH-CBS-130	0.036	ND	
	06/20/12	12-15	North	UH-CBS-131	0.033	ND	
	06/20/12	12-15	North	UH-CBS-132	0.036	ND	
	06/20/12	12-15	North	UH-CBS-133	0.036	0.086	
	06/20/12	12-15	North	UH-CBS-134	0.033	0.338	J

Notes:

1. Samples were extracted by EPA Method 3540C and analyzed for PCBs by Method 8082.
2. Results were reported as Aroclor 1254; no other Aroclors detected above lab reporting limits.
3. Sample results are presented in units of milligram per kilogram (mg/kg).
4. ND = Non-detect; PCBs were not detected above the lab reporting limits, as indicated.
5. J = Result is qualified as estimated based on data validation.
6. Samples highlighted in gray text were subsequently excavated from the site.
7. July 9, 2012 re-dig samples were collected 1-foot north and 1-foot east from the original sampling point.





UNIVERSITY OF SOUTHERN MAINE GORHAM, MAINE	DESIGNED BY: ALW		CHECKED BY: JAH
	DRAWN BY: EVR		FCR-Figure 2-2.dwg
UPTON HALL LIMITS OF EXCAVATION & RESULTS OF VERIFICATION SAMPLING			
FINAL COMPLETION REPORT			
JOB NO: 224164			
DATE: AUGUST 2012			
SCALE: AS NOTED			
FIGURE 2-2			

APPENDIX A: EPA APPROVALS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUN 29 2011

Mr. Robert W. Betram
Executive Director of Facilities Management
University of Southern Maine
25 Bedford Street
Portland, Maine 04101

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)
and § 761.79(h)
Anderson and Upton Halls
University of Southern Maine, Gorham, Maine

Dear Mr. Betram:

This is in response to the University of Southern Maine (USM) Notification¹ for approval of a proposed plan to address PCB contamination located at the buildings known as Anderson Hall at 40 Campus Avenue and Upton Hall at 52 University Way, Gorham, Maine (the Sites). The Sites contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62. Specifically, PCBs have been found in caulk and in the adjacent building substrate (i.e. brick and concrete).

In its Notification USM has proposed the following PCB cleanup and disposal plan:

- Anderson Hall
 - Remove caulk and window banks in their entirety from the north, west, and south faces of the building and dispose as greater than or equal to (\geq 50 ppm PCB waste in a TSCA approved or hazardous waste landfill
 - Remove caulk, and window and wall components in direct contact with PCB caulk from the east and northeast faces of the building and dispose as \geq 50 ppm in a TSCA approved or hazardous waste landfill

¹ The Notification was prepared by Woodard & Curran on behalf of the USM to satisfy the requirements under 40 CFR § 761.61(c) and § 761.79(h). Information was submitted dated March 18, 2011 (PCB Remediation Plan) and June 8, 2011 (Response to Comments). These submittals shall be referred to as the "Notification".

- Remove PCB caulk, clean *non-porous surfaces* (i.e., metal tracks) to remove residual caulk, and encapsulate with two coats of an epoxy coating
- Encapsulate *porous surfaces* (i.e., concrete overhang and concrete slab edge) with a liquid barrier system
- Upton Hall
 - Remove ≥ 50 ppm PCB caulk and *non-porous surfaces* (i.e., metal frames) in direct contact with caulk and dispose in a TSCA approved or hazardous waste landfill
 - Remove PCB caulk between 1 and 50 ppm and *non-porous surfaces* (i.e., glass panes, metal panels, and internal metal frames) and dispose of in accordance with § 761.61(a)(5)(i)(B)(2)(ii)
 - *Porous surfaces* (e.g., brick and concrete) with > 1 ppm PCB concentration will be encapsulated with an epoxy or acrylic coating, as specified in the Notification
 - Remove ≥ 50 ppm PCB paint from *non-porous surfaces* (i.e., steel beam) to achieve a cleanup standard of $< 10 \mu\text{g}/100 \text{ cm}^2$, and dispose of paint in a TSCA approved or hazardous waste landfill

In the event that *non-porous surfaces* (i.e., steel beam) cannot be decontaminated to the PCB cleanup standard of $\leq 10 \mu\text{g}/100 \text{ cm}^2$, USM is proposing to encapsulate the steel beam. If encapsulation is implemented, USM will be required to add this area to the deed restriction and to the long-term monitoring and maintenance implementation plan (MMIP) for the encapsulated surfaces (See Attachment 1, Conditions 17 and 18).

Based on the EPA's review, the information provided in the Notification meets the requirements under § 761.62(a) and § 761.79(h) for abatement of PCB caulk and paint and § 761.61(a) and (c) for decontamination and/or encapsulation of the *porous* and *non-porous surfaces*. EPA finds that the proposed encapsulation of PCB-contaminated *porous* and *non-porous surfaces* should effectively prevent direct exposure of these PCB-contaminated *porous* and *non-porous surfaces* to building users provided the encapsulated surfaces are maintained. As such, EPA may approve the encapsulation under § 761.61(c).

This Approval does not provide for cleanup and disposal of PCB-contaminated soils since additional sampling is necessary to define the nature and extent of the contamination. Upon completion of the investigation of soils at the Sites, USM may request a modification to this Approval to incorporate cleanup of PCB-contaminated soils or USM may submit a separate cleanup and disposal notification under 40 CFR § 761.61 (see Attachment 1, Condition 20).

USM may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62(a); § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its right to require additional investigation or mitigation

measures should the results of the long-term monitoring sampling indicate an unreasonable risk to the building users.

Please be aware that this Approval requires USM to conduct outreach activities for the residents of Anderson and Upton Halls concerning the PCB remediation work. Documentation of the outreach effort shall be submitted to EPA. (Attachment 1, Approval Condition 11)

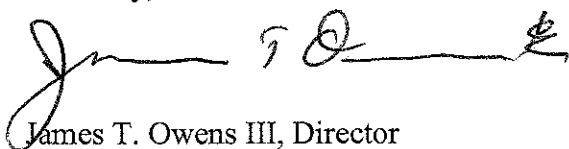
Please note that USM will be required to record a notation on the deed as required under § 761.61(a)(8) since PCBs at > 1 ppm will remain on the Sites.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,



James T. Owens III, Director
Office of Site Remediation & Restoration

cc ✓ Jeffrey Hamel, Woodard & Curran
MEDEP
File

Attachment 1 – PCB Approval Conditions

ATTACHMENT 1:

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS
ANDERSON HALL AND UPTON HALL (the Sites)
UNIVERSITY OF SOUTHERN MAINE
GORHAM, MAINE**

GENERAL CONDITIONS

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Sites and identified in the Notification.
2. University of Southern Maine (USM) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. USM must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, USM shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. USM is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time USM has or receives information indicating that USM or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by USM are authorized to conduct the activities set forth in the Notification. USM is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release USM from compliance with any applicable requirements of federal, state or local law; or 3) release USM from liability for, or otherwise resolve, any violations of federal, state or local law.

NOTIFICATION AND CERTIFICATION CONDITIONS

9. This Approval may be revoked if the EPA does not receive written notification from USM of its acceptance of the conditions of this Approval within 10 business days of receipt.
10. USM shall submit the following information for EPA review and/or approval:
 - a. A certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
 - b. A contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,
 - c. A certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

DECONTAMINATION AND DISPOSAL CONDITIONS

11. USM shall conduct outreach activities for the Anderson Hall and Upton Hall residents on the PCB remediation work. USM shall submit information on its outreach activities within 30 days of receipt of this Approval.
12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.

13. All visible residues of PCB-contaminated caulk and paint (i.e. *PCB bulk product waste*) shall be removed as described in the Notification.
14. The decontamination standard for *non-porous surfaces* (i.e., steel beams) shall be $\leq 10 \mu\text{g}/100 \text{ cm}^2$ PCBs.
 - a. All post-decontamination verification sampling of *non-porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e., $\mu\text{g}/100 \text{ cm}^2$) and at the frequency specified in the Notification.
 - b. For decontaminated *non-porous surfaces* that have PCB concentrations exceeding the decontamination standard, USM may conduct additional decontamination to achieve the required decontamination standard or must store and dispose of these wastes as TSCA-regulated waste in accordance with 40 CFR Part 761.
 - c. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.
 - d. In the event that *nonporous surfaces* (i.e. steel beam) cannot be decontaminated to the standard of $\leq 10 \mu\text{g}/100 \text{ cm}^2$ PCBs. the encapsulation alternative, as described in the Notification shall be implemented.
15. Following encapsulation of PCB-contaminated *porous surfaces* and *non-porous surfaces* post-encapsulation sampling shall be conducted to determine the effectiveness of the encapsulation.
 - a. Wipe sampling of encapsulated surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e. $\mu\text{g}/100 \text{ cm}^2$). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
 - b. In the event that the PCB concentration of any wipe sample is greater than ($>$) $1 \mu\text{g}/100 \text{ cm}^2$, USM shall contact EPA for further discussion and direction on alternatives.
16. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.

- a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
- b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
- c. PCB-contaminated water generated during decontamination or dewatering shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.

DEED RESTRICTION AND USE CONDITIONS

17. Within thirty (45) days of completing the activities described in the Notification and in the Approval, USM shall submit for EPA review and approval, a draft deed restriction for the Sites. The deed restriction shall include: a description of the extent and levels of contamination at the Sites following abatement; a description of the actions taken at the Sites; a description of the use restrictions for the Sites; and the long-term monitoring and maintenance requirements on the Sites. Within seven (7) days of receipt of EPA's approval of the draft deed restriction, USM shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

INSPECTION, MODIFICATION AND REVOCATION CONDITIONS

18. Within 60 days of completion of the work authorized under this Approval, USM shall submit for EPA's review and approval, a detailed monitoring and maintenance implementation plan (MMIP) for the surface barriers. USM shall incorporate any changes to the MMIP required by EPA.
 - a. The MMIP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and, reporting requirements, as applicable
 - b. The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including teachers, parents, student, other on-site workers, and interested stakeholders.
 - c. The MMIP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the barriers encapsulating the PCB-contaminated surfaces.

- d. USM shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMIP is necessary in order to monitor and/or evaluate the long-term effectiveness of the barriers.
 - e. Activities required under the MMIP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.
19. USM shall allow any authorized representative of the Administrator of the EPA to inspect the Sites and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by USM to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
20. Any modification(s) in the plan, specifications, or information submitted by USM, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. USM shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.
21. If such modification involves a change in the use of the Sites which results in exposures not considered in the Application, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from USM to make a determination regarding potential risk.
22. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

RECORDKEEPING AND REPORTING CONDITIONS

23. USM shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by USM in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.

24. As required under Condition 18 of this Approval, USM shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMIP to be approved by EPA
25. USM shall submit a final report to the EPA within 90 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of and the size of the PCB cleanup area(s); copies of manifests and bills of lading; and copies of certificates of disposal or similar certifications issued by the disposer. The Report shall also include a copy of the recorded deed restriction and a certification signed by a USM official verifying that the authorized activities have been implemented in accordance with this Approval and the Notification.
26. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 – (OSRR07-2)
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527
27. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

END OF ATTACHMENT 1

Amy Wallace

From: Kimberly Tisa <Tisa.Kimberly@epamail.epa.gov>
Sent: Thursday, March 29, 2012 11:51 AM
To: Jeff Hamel
Cc: Amy Wallace
Subject: Re: USM Gorham - PCB Remediation - Soil Remediation Modification Request

Jeff-

I have reviewed the proposed modification to the June 29, 2011 PCB Cleanup and Disposal Approval which was submitted in accordance with Condition 20.

Your proposed modification is to incorporate remediation of PCB-contaminated soils with > 1 ppm which have been identified along the perimeters of Anderson and Upton Halls.

Based on my review, I provide the following comment:

1. The proposed soil removal limits and verification sampling appear reasonable. However, I do believe that additional verification samples (higher frequency) should be conducted in several specific areas where the PCB vertical limits were not clearly established. These areas include the following:

- Anderson Hall: former sampling locations 069, 108, and 109 as identified on Figure 2-1. Figure 3-1 proposes verification sampling at approximately 5-feet from this area. Accordingly, additional samples should be collected at the specific locations.
- Anderson Hall: former sampling location 107 as identified on Figure 2-1. An additional sample should be collected along the perimeter to confirm PCB concentrations ≤ 1 ppm.
- Upton Hall: former sampling location 120 as identified on Figure 2-2. The proposed verification samples as identified on Figure 3-2 appear to be a minimum of 5-feet from this location. As such, a sample point should be added at the former 120 location.

Should you have any questions, please feel free to call me.

Kimberly N. Tisa
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, MA 02109-3912

Phone: 617.918.1527
E-Fax: 617.918.0527

tisa.kimberly@epa.gov

-----"Jeff Hamel" <jhamel@woodardcurran.com> <<mailto:jhamel@woodardcurran.com>> wrote: -----
To: Kimberly Tisa/R1/USEPA/US@EPA
From: "Jeff Hamel" <jhamel@woodardcurran.com> <<mailto:jhamel@woodardcurran.com>>
Date: 01/20/2012 07:48AM
Cc: "Amy Wallace" <awallace@woodardcurran.com> <<mailto:awallace@woodardcurran.com>>
Subject: USM Gorham - PCB Remediation - Soil Remediation Modification Request

Kim -

On behalf of the University of Southern Maine, Woodard & Curran has prepared a Soil Remediation Plan to address the remediation of PCB-impacted soils located adjacent to two buildings, Anderson Hall and Upton Hall, at the USM campus in Gorham, Maine.

This Plan has been prepared as a Modification request in accordance with EPA's June 29, 2011 PCB Cleanup and Disposal Approval under 40 CFR 761.61(a) and (c) and 761.79(h).

A Final Completion Report for the building materials work at these two buildings, which was subject to the Approval, was submitted on January 9, 2012.

As discussed in the Plan, the soil removal activities are planned to coincide with the school's summer 2012 calendar.

Two copies of the plan were sent to your attention in Thursday's overnight mail.

If you have any comments, questions, or require further information, please do not hesitate to e-mail or call.

Thanks

Jeff

Jeffrey Hamel, LSP, LEP
Senior Vice President
Woodard & Curran

978-557-8150
978-317-3635 (cell)

APPENDIX B: LABORATORY ANALYTICAL REPORTS

APPENDIX C: WASTE PROFILE SHEET & WASTE SHIPMENT RECORDS

Generator's Nonhazardous Waste Profile Sheet



Requested Disposal Facility Waste Management-Rochester, NH Profile Number _____

☐ Renewal for Profile Number _____ Waste Approval Expiration Date _____

A. Waste Generator Facility Information (must reflect location of waste generation/origin)

1. Generator Name: University Of Maine System for the University of Southern Maine Anderson & Upton Hall
2. Site Address: Campus Drive/University Way
3. City/ZIP: Gorham/ 04038
4. State: ME
5. County: Cumberland
6. Contact Name/Title: Carol Potter
7. Email Address: cpotter@usm.maine.edu
8. Phone: 207-2288124
9. FAX: _____
10. NAICS Code: _____
11. Generator USEPA ID #: MER000500587
12. State ID# (if applicable): _____

B. Customer Information ☐ same as above

P. O. Number: _____

1. Customer Name: ENPRO Services Inc.
2. Billing Address: 12 Mulliken Way
3. City, State and ZIP: Newburyport, MA 01950
4. Contact Name: John Curley
5. Contact Email: jcurley@enpro.com
6. Phone: 9782251122
7. Transporter Name: ENPRO Services Inc.
8. Transporter ID # (if appl.): MAD980670004
9. Transporter Address: 12 Mulliken Way
10. City, State and ZIP: Newburyport, MA 01950

C. Waste Stream Information

1. DESCRIPTION

- a. Common Waste Name: Urban Fill/ Soil Contaminated with trace PCBs
- State Waste Code(s): _____

- b. Describe Process Generating Waste or Source of Contamination:

Soil remediation; PCBs leached from caulking into soil media. Under 50 ppm self-implementing plan.

- c. Typical Color(s): brown
- d. Strong Odor? ☐ Yes ☒ No Describe: _____
- e. Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Powder ☐ Semi-Solid or Sludge ☐ Other: _____
- f. Layers? ☒ Single layer ☐ Multi-layer ☐ NA
- g. Water Reactive? ☐ Yes ☒ No If Yes, Describe: _____
- h. Free Liquid Range (%): _____ to _____ ☒ NA(solid)
- i. pH Range: ☐ ≤2 ☐ 2.1-12.4 ☐ ≥12.5 ☒ NA(solid) ☐ Actual: _____
- j. Liquid Flash Point: ☐ < 140°F ☐ ≥ 140°F ☒ NA(solid) ☐ Actual: _____
- k. Flammable Solid: ☐ Yes ☒ No
- l. Physical Constituents: List all constituents of waste stream - (e.g. Soil 0-80%, Wood 0-20%): ☐ (See Attached)

Constituents (Total Composition Must be > 100%)	Lower Range	Unit of Measure	Upper Range	Unit of Measure
1. <u>Soil</u>	<u>100</u>	<u>%</u>	<u>100</u>	<u>%</u>
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____
6. _____	_____	_____	_____	_____

2. ESTIMATED QUANTITY OF WASTE AND SHIPPING INFORMATION

- a. ☒ Event ☐ Base/Ongoing (Check One)
- b. Estimated Annual Quantity: 120 ☒ Tons ☐ Cubic Yards ☐ Drums ☐ Gallons ☐ Other (specify): _____
- c. Shipping Frequency: roll-offs Units per ☐ Month ☐ Quarter ☐ Year ☒ One Time ☐ Other
- d. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If yes, answer e.) ☐ Yes ☒ No
- e. USDOT Shipping Description (if applicable): Non DOT, Non RCRA Regulated Material

3. SAFETY REQUIREMENTS (Handling, PPE, etc.): Normal landfill site personal protective equipment



Generator's Nonhazardous Waste Profile Sheet

D. Regulatory Status (Please check appropriate responses)

1. Is this a USEPA (40 CFR Part 261)/State hazardous waste? If yes, contact your sales representative. ☐ Yes ☒ No
2. Is this waste included in one or more of categories below (Check all that apply)? If yes, attach supporting documentation. ☐ Yes ☒ No
 - ☐ Delisted Hazardous Waste ☐ Excluded Wastes Under 40 CFR 261.4
 - ☐ Treated Hazardous Waste Debris ☐ Treated Characteristic Hazardous Waste
3. Is the waste from a Federal (40 CFR 300, Appendix B) or state mandated clean-up? If yes, see instructions. ☐ Yes ☒ No
4. Does the waste represented by this waste profile sheet contain radioactive material? ☐ Yes ☒ No
 - a. If yes, is disposal regulated by the Nuclear Regulatory Commission? ☐ Yes ☐ No
 - b. If yes, is disposal regulated by a State Agency for radioactive waste/NORM? ☐ Yes ☐ No
5. Does the waste represented by this waste profile sheet contain concentrations of regulated Polychlorinated Biphenyls (PCBs)? ☒ Yes ☐ No
 - a. If yes, is disposal regulated under TSCA? ☒ Yes ☐ No
6. Does the waste contain untreated, regulated, medical or infectious waste? ☐ Yes ☒ No
7. Does the waste contain asbestos? ☐ Yes ☒ No If Yes, ☐ Friable ☐ Non Friable
8. Is this profile for remediation waste from a facility that is a major source of Hazardous Air Pollutants (Site Remediation NESHA, 40 CFR 63 subpart GGGGG)? ☐ Yes ☒ No

If yes, does the waste contain <500 ppmw VOHAPs at the point of determination? ☐ Yes ☐ No

E. Generator Certification (Please read and certify by signature below)

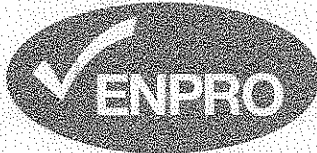
By signing this Generator's Waste Profile Sheet, I hereby certify that all:

1. Information submitted in this profile and all attached documents contain true and accurate descriptions of the waste material;
2. Relevant information within the possession of the Generator regarding known or suspected hazards pertaining to this waste has been disclosed to WM/the Contractor;
3. Analytical data attached pertaining to the profiled waste was derived from testing a representative sample in accordance with 40 CFR 261.20(c) or equivalent rules; and
4. Changes that occur in the character of the waste (i.e. changes in the process or new analytical) will be identified by the Generator and disclosed to WM (and the Contractor if applicable) prior to providing the waste to WM (and the Contractor if applicable).
5. Check all that apply:
 - ☒ Attached analytical pertains to the waste. Identify laboratory & sample ID #'s and parameters tested:
PCB, VOC, SVOC, RCRA 8 Metals, Corrosivity, Ignitability, Reactivity (need non-pest/herb cert. and EPA appra) # Pages: _____
 - ☐ Only the analyses identified on the attachment pertain to the waste (identify by laboratory & sample ID #'s and parameters tested).
Attachment #: _____
 - ☐ Additional information necessary to characterize the profiled waste has been attached (other than analytical).
Indicate the number of attached pages: _____
 - ☐ I am an agent signing on behalf of the Generator, and the delegation of authority to me from the Generator for this signature is available upon request.
 - ☐ By Generator process knowledge, the following waste is not a listed waste and is below all TCLP regulatory limits.

Certification Signature: Carol Potter Title: X BUILDING CONSTRUCTION ENGINEER
Company Name: X UNIV. OF MAINE SYSTEM Name (Print): X CAROL POTTER
Date: X JUNE 8, 2012

FOR WM USE ONLY

Management Method: ☐ Landfill ☐ Bioremediation Approval Decision: ☐ Approved ☐ Not Approved
☐ Non-hazardous solidification ☐ Other: _____ Waste Approval Expiration Date: _____
Management Facility Precautions, Special Handling Procedures or Limitation on approval: _____
☐ Shall not contain free liquid
☐ Shipment must be scheduled into disposal facility
☐ Approval Number must accompany each shipment
☐ Waste Manifest must accompany load
WM Authorization Name / Title: _____ Date: _____
State Authorization (if Required): _____ Date: _____



1004

SC

www.enpro.com

www.isdf.com

www.hazardouswaste.com

www.enpro.com

www.hazardouswaste.com

www.enpro.com

www.isdf.com

www.hazardouswaste.com

NON HAZARDOUS WASTE MANIFEST			1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1	
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04033			4. Generator's Phone (207) 228-8124		5. Transporter 1 Company Name ENPRO SERVICES, INC.		6. US EPA ID Number MAD980870004	
7. Transporter 2 Company Name			8. US EPA ID Number		9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03839		10. US EPA ID Number DESSWSP95001	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
a. Urban Fill Soil Contaminated with Trace PCB's			001 CM		90016 T		State NONE	
b.							State NONE	
c.							State	
d.							State	
J. Additional Descriptions for Materials Listed Above Trace PCB cont. soil profile approval 189743NH ERGM140			K. Handling Codes for Wastes Listed Above Interim Final		a. b.		c. d.	
15. Special Handling Instructions and Additional Information ENPRO SERVICES, INC. - 24 HOURS - (800) 986-1102			1) (ENPRO PO 15350)		Point of Departure:		ENPRO JOB# 6163-12	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.			Printed/Typed Name RANDY S. WOOD		Signature Randy S. Wood		Month Day Year 06/20/12	
17. Transporter 1 Acknowledgement of Receipt of Materials			Printed/Typed Name Mike Croninore		Signature Mike Croninore		Month Day Year 06/20/12	
18. Transporter 2 Acknowledgement of Receipt of Materials			Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.			Printed/Typed Name G. M. Fisher		Signature G. M. Fisher		Month Day Year 06/20/12	

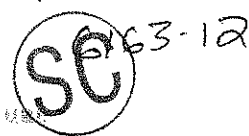
TRANSPORTER #1



Jernkey Landfill
20 Rochester Neck Rd
Rochester, NH, 03839
Ph: (800) 963-4776

Original
Ticket# 212379

NH200120697



Customer Name ENPROSVCS INC Enpro Services, Carrier ENPRO ENPRO SERVICES
Ticket Date 06/20/2012 Vehicle# 1004 Value
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000352
State Waste Code None Gen EPR ID Not Required
Manifest 20697 PO
Destination Profile 489743NH (URBAN FILL (COVER))
Generator NE-USMUNTONHILL University of Maine System

Time	Scale	Operator	Inbound	Gross	
In 06/20/2012 12:02:20	scale 1	inboq eric metaler		Tare	63000 lb
Out 06/20/2012 12:46:20	scale 2	outbo phil boisvert		Net	35600 lb
				Tons	20200 lb
					14.10

Comments

Product	LD%	Qty	Unit	Rate	Fee	Amount	Origin
1 Declassified-Tons- 100		14.10	Tons				NE
2 FUEL-Fuel Surcharg 100		%					NE
3 EUP-P-Standard Env 100		%					NE

Total Fees
Total Ticket

SOLID WASTE TRANSPORTER DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature

405WM-Gonic.



1004

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NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ME X 0 2 0 0 0 0 0 0 0 0 2 0 6 9 7	Manifest Document No. 2 0 6 9 7	2. Page 1 of 1
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038		Attn: Carol Potter		A. Non-Hazardous Manifest Document Number NHZ001 20701
4. Generator's Phone (2 0 7) 2 2 8 - 8 1 2 4		6. US EPA ID Number MA D 9 8 0 6 7 0 0 0 4		C. S.T. (Lic. Plate #) WE
5. Transporter 1 Company Name ENPRO SERVICES, INC.		8. US EPA ID Number		D. Transporter's Phone 878-485-1535
7. Transporter 2 Company Name		10. US EPA ID Number		E. S.T. (Lic. Plate #)
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03838		12. Containers No. Type		F. Transporter's Phone
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. Urban Fill/Soil Contaminated with Trace PCB's		13. Total Quantity 0 0 1 C M 0 0 0 1 G T		G. State Facility's ID 90 ROCHESTER NECK ROAD ROCHESTER NH 03838
b.				H. Facility's Phone
c.				
d.				
Additional Descriptions for Materials Listed Above trace PCB cont. soil profile approval 889743NH ERGW140		K. Handling Codes for Wastes Listed Above Interim Final Interim Final		
15. Special Handling Instructions and Additional Information ENPRO CONTRACT 1 (ENPRO PO 15350) ENPRO SERVICES, INC. - 24 HOURS - (800) 966-1102		Point of Departure: ENPRO JOB# 6153-12		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.				
Printed/Typed Name Mark Johnson		Signature M Johnson		Month Day Year 6 2 1 1 2
17. Transporter 1 Acknowledgement of Receipt of Materials				Date
Printed/Typed Name Mike Chomere		Signature Mike Chomere		Month Day Year 6 2 1 1 2
18. Transporter 2 Acknowledgement of Receipt of Materials				Date
Printed/Typed Name		Signature		Month Day Year
19. Discrepancy Indication Space				
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.				
Printed/Typed Name G. Metcalfe		Signature G. Metcalfe		Month Day Year 6 2 1 1 2

TRANSPORTER #1



Turnkey Landfill
20 Rochester Neck Rd
Rochester, NH, 03839
Ph: (603) 963-4776

Original
Ticket# 012746

NH200176701
6/83-12

Customer Name ENPROSVC INC Enpro Services, Carrier ENPRO ENPRO SERVICES
Ticket Date 06/21/2012 Vehicle# 10034 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 00000000
State Waste Code None Gen EPA ID Not Required
Manifest 20701 PG
Destination Profile 40974344H (URBAN FULL COVER)
Generator ME-USMURTONHALL University of Maine System

	Time	Scale	Operator	Inbound	Gross	
In	06/21/2012 15:30:10	scale 1	inban eric wetzler		Tare	57340 lb
Out	06/21/2012 16:01:36	scale 2	guthrie phil boisvert		Net	30040 lb
					Tons	17.98

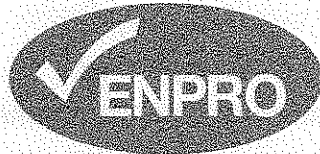
Comments

Product	LDX	Qty	Unit	Rate	Fee	Amount	Origin
1	Declassified-Instr	100	Tons				ME
2	FUEL-Fuel Surcharge	100	%				ME
3	EVF-P-Standard Env	100	%				ME

Total Fees
Total Ticket

SOLID WASTE TRANSPORTER DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature
405WM-Gonic



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NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MEX0200000000020697		Manifest Document No. 20697		2. Page 1 of 1	
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038				4. Generator's Phone (207) 228-8124			
5. Transporter 1 Company Name ENPRO SERVICES, INC.				6. US EPA ID Number MAD980670004		A. Non-Hazardous Manifest Document Number NHZ001 20599	
7. Transporter 2 Company Name				8. US EPA ID Number		B. S.G.T. (Gen. Site Address) NE 101 64519	
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03839				10. US EPA ID Number DESISWSP95001		C. S.T.I. (Lic. Plate #) D. Transporter's Phone E. S.T.I. (Lic. Plate #) F. Transporter's Phone G. State Facility's ID 90 ROCHESTER NECK ROAD ROCHESTER NH 03839 H. Facility's Phone 800-663-1778	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity	
a. Urban Fill/Soil Contaminated with Trace PCB's				001 CM 010016 T		14. Unit Wt/Vol Waste No.	
b.						State NONE	
c.						State NONE	
d.						State	
e.						State	
f.						State	
g.						State	
h.						State	
i.						State	
j.						State	
k.						State	
l.						State	
m.						State	
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nz.						State	
oa.							



Turnkey Landfill
30-Rochester Neck Rd
Rochester, NH, 03602
Ph: (603) 963-4775

Original
Ticket# 012652

NH200120699
616312

Customer Name ENPRO SERVICES INC Enpro Services, Carrier ENPRO ENPRO SERVICES
Ticket Date 06/21/2012 Vehicle# 1001 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000352
State Waste Code None Gen EPA ID Not Required
Manifest 20699 PO
Destination Profile 409743NH (URBAN FILL (COVER))
Generator NE-USMONTMALL University of Maine System

Time	Scale	Operator	Inbound	Gross	69340 lb
In 06/21/2012 11:54:14	scale 1 inbound	eric metzler		Tare	35740 lb
Out 06/21/2012 12:29:00	scale 2 out	phil bulvert		Net	33600 lb
				Tons	16.80

Comments:

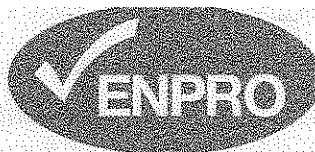


Product	LIN	Qty	Unit	Rate	Amount	Origin
1	Declassified-Tons- 100	16.80	Tons			NE
2	FUEL-Fuel Surchary 100					NE
3	EUP-F-Standard Env 100					NE

Total Fees
Total Ticket

SOLID WASTE TRANSPORTER DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature



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NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038		4. Generator's Phone (207) 228-8124		5. Transporter 1 Company Name ENPRO SERVICES INC.
6. US EPA ID Number MEX02000000000020698		7. Transporter 2 Company Name		8. US EPA ID Number
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 80 ROCHESTER NECK ROAD ROCHESTER NH 03839		10. US EPA ID Number DESSWSP95001		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)
a. Urban Fill/Soil Contaminated with Trace PCB's		12. Containers No. Type		13. Total Quantity
b.		0 0 1 CM		14. Unit Wt/Vol
c.				15. State
d.				16. State
17. Additional Descriptions for Materials Listed Above trace PCB cont. soil profile approve AST43NH EPCB140		18. Handling Codes for Wastes Listed Above Interim Final Interim Final		19. State
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.		21. Facility's Phone		22. State
23. Generator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.		24. Point of Departure: ENPRO JOSH 6163-12		25. Date
26. Transporter 1 Acknowledgement of Receipt of Materials		27. Transporter 2 Acknowledgement of Receipt of Materials		28. Date
29. Discrepancy Indication Space		30. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.		31. Date

TRANSPORTER #1



Turnkey Landfill
30 Rochester Neck Rd
Rochester, NH, 03839
Ph: (800) 963-4776

Original
Ticket# 012516

NH200120698



Customer Name ENPROSVCS INC Enpro Services, Carrier ENPRO ENPRO SERVICES
Ticket Date 06/21/2012 Vehicle# 1004 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000332
State Waste Code None Gen EPA ID Not Required
Manifest 20698 DO
Destination Profile 489743NH (URBAN FILL (COVER))
Generator NE-HISRUPTONHALL University of Maine System

Time	Scale	Operator	Inbound	Gross
In 06/21/2012 07:11:49	scale 1 inbound	eric metaler		76520 lb
Out 06/21/2012 08:16:46	scale 2 out	phil boisvert		34940 lb
				41580 lb
				20.79

Consent-

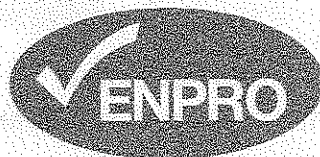


Product	LDX	Qty	Rate	Fee	Amount	Origin
1 Declassified-Tons-	100	20.79	Tons			NE
2 FUEL-Fuel Surcharg	100		%			NE
3 EWF-P-Standard Env	100		%			NE

Total Fees
Total Ticket

SOLID WASTE TRANSPORTER DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature



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NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ME X 0 2 0 0 0 0 0 0 0 0 2 0 8 9 7		Manifest Document No. 2 0 8 9 7		2. Page 1 of 1					
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038				Attn: Carol Potter							
4. Generator's Phone (207) 228-8124				A. Non-Hazardous Manifest Document Number NHZ001 20700							
5. Transporter 1 Company Name ENPRO SERVICES, INC.				B. S.G.I. (Gen. Site Address) ME MA 64919							
6. US EPA ID Number MAD980870004				C. S.T.I. (Lic. Plate #) MH							
7. Transporter 2 Company Name				D. Transporter's Phone 878-485-1595							
8. US EPA ID Number				E. S.T.I. (Lic. Plate #)							
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03839				F. Transporter's Phone							
10. US EPA ID Number DESSWSP95001				G. State Facility's ID 90 ROCHESTER NECK ROAD ROCHESTER NH 03839							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		Waste No.	
a. Urban Fill/Soil Contaminated with Trace PCB's				001 CM		99416 T				State: NONE	
b.										State: NONE	
c.										State:	
c.										State:	
c.										State:	
c.										State:	
J. Additional Descriptions for Materials Listed Above Trace PCB cont. and profile approval 489743NH ERGP140				K. Handling Codes for Wastes Listed Above Interim Final		Interim Final		Interim Final			
19.75 Tons				c		d					
Special Handling Instructions and Additional Information ENPRO SERVICES, INC. - 24 HOURS - (800) 958-1107				Point of Departure: ENPRO JOB# 6163-12							
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.											
Printed/Typed Name Mark Johnson				Signature Mark Johnson				Date 6/21/12			
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature Mike Chomere				Date 6/21/12			
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature				Date			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 19.											
Printed/Typed Name G. M. M.				Signature G. M. M.				Date 6/21/12			

TRANSPORTER #1



Turnkey Landfill
30 Rochester Neck Rd
Rochester, NH, 03025
PH: (603) 953-4776

Original
Ticket# 612792
NH200120700

Customer Name ENPRO ENVIRONMENTAL SERVICES, Carrier ENPRO ENVIRONMENTAL SERVICES
Ticket Date 06/22/2012 Vehicle# 1004 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 00002502
State Waste Code None Gen EPA ID Not Required
Manifest # 20700 PD
Destination Profile 485743NH (HRSN FILL (COVER))
Generator NE-UNH/UNH/UNH University of Maine System

Time Scale Operator Inbound Gross
In 06/22/2012 06:45:41 scale 1 Inbound epic meter 74300 lb
Out 06/22/2012 07:52:29 scale 2 outbo phil belmont 34800 lb
Tons 35500 lb
Tons 19.75

Comments

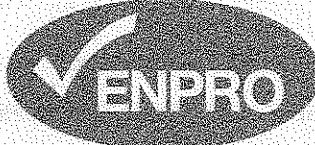
Product	Qty	Rate	Fee	Amount	Origin
1 Declassified-Tons- 100	19.75	Tons			NE
2 FUEL-Fuel Surcharge 100	X				NE
3 EVF-P-Standard Env 100	X				NE

Total Fees
Total Ticket

UNH WASTE TRANSPORTATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature

APSWML/Cont



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www.tsdf.com

www.hazardouswaste.com

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www.hazardouswaste.com

NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MEX020000000020697	Manifest Document No. 20697	2. Page 1 of 1	
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038		Attn: Carol Potter		A. Non-Hazardous Manifest Document Number NH2001 20702	
4. Generator's Phone (207) 228-8124				B. S.G.1 (Gen. Site Address) ME	
5. Transporter 1 Company Name ENPRO SERVICES, INC.		6. US EPA ID Number MAD980670004		C. S.T.1 (Lic. Plate #) NH 64219	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 978-465-1585	
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03839		10. US EPA ID Number DESSWSP95001		E. S.T.1 (Lic. Plate #) F. Transporter's Phone G. State Facility's ID H. Facility's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol
a. Urban Fill/Soil Contaminated with Trace PCB's		0 0 1 CM 9 20 1 6 T			
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above Trace PCB cont. soil profile approval A65743NH ERGN140		K. Handling Codes for Wastes Listed Above Interim Final Interim Final			
L. Special Handling Instructions and Additional Information ENPRO SERVICES, INC. - 24 HOURS - (508) 986-1107		1. (ENPRO PO 15350)		Point of Departure: ENPRO JOB# 6163-12	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.					
Printed/Typed Name Mark Johnson		Signature M. Johnson		Month Day Year 11 12 12	
17. Transporter 1 Acknowledgement of Receipt of Materials				Date	
Printed/Typed Name Mike Chomere		Signature M. Chomere		Month Day Year 01 06 22 12	
18. Transporter 2 Acknowledgement of Receipt of Materials				Date	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name M. Johnson		Signature M. Johnson		Month Day Year 11 12 12	

TRANSPORTER #1



Timothy Landfill
30 Rochester Neck Rd.
Rochester, NY, 14622
Ph: (800) 963-7710

Original
Ticket #12342

NH200186702

6163-12

SC

Customer Name: EPHRATA/IND. EMP. SERVICES
Ticket Date: 06/25/2012
Payment Type: Credit Account
Manual Ticket#
Hauling Ticket#
Route
State Route Code: None
Manifest: 20702
Destination: PROFILE
Generator: NE-HOSPITAL/UNIV. of Maine System
Carrier: EPHRATA/IND. EMP. SERVICES
Vehicle# 1204
Container
Driver
Check#
Billing # 00000000
Gen Exp ID: Not Required
PU
Profile: 48073244 (URBAN FILL (COVER))

Time: 06/25/2012 06:47:33
ID: 06/25/2012 07:26:57
Scale: 1
Scale 2
Operation: 10000 PHL
Inbound: 10000
Expense: 10000
Amount: 10000
Origin: 10000

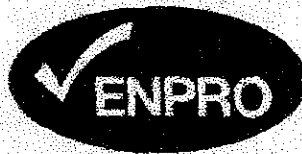
Product: 10000
Qty: 10000
Rate: 10000
Fee: 10000
Amount: 10000
Origin: 10000

1 Declared/100-Tons 15.10 Tons
2 THE-PAUL SURCHARGE 100
3 EPH-P-Standard Env 100

Total Fees
Total Ticket

WMM WASTE MANAGEMENT DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TYPED CONTAINS NO INFORMATION IN VIOLATION OF 405WM-Gonic.

Driver's Signature
405WM-Gonic



1004 SC

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NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MEX020000000020734		Manifest Document No. 20734		2. Page 1 of 1	
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038				4. Generator's Phone (207) 228-8124		5. Non-Hazardous Manifest Document Number NHZ001 20734	
5. Transporter 1 Company Name ENPRO SERVICES, INC.				6. US EPA ID Number MAD980670004		7. C.S.T. (Lic. Plate #) NH 1A 6499	
7. Transporter 2 Company Name				8. US EPA ID Number		8. Transporter's Phone 678-405-1885	
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03839				10. US EPA ID Number DESSWSP95001		9. C.S.T. (Lic. Plate #) NH 1A 6499	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity	
a. Urban Fill Soil Contaminated with Trace PCB's				0.01 CM		14. Unit Wt/Vol T	
b.						State Waste No. NONE	
c.						State NONE	
d.						State	
e.						State	
f.						State	
g.						State	
h.						State	
i.						State	
j. Additional Descriptions for Materials Listed Above Trace PCB cont. soil profile approval 485743NH ERGHI#0				k. Handling Codes for Wastes Listed Above Interim Final Interim Final		a. b. c. d.	
15. ENPRO SERVICE Instructions and Additional Information ENPRO SERVICES, INC. - 24 HOURS - (800) 966-1102				Point of Departure: ENPRO JOB# 6163-12			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.							
Printed/Typed Name Patrick Shaw				Signature Patrick Shaw		Month Day Year 07/01/12	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature Mike Chomiere		Month Day Year 07/09/12	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator, Certification of receipt of waste materials covered by this manifest except as noted in item 19.				Date			
Printed/Typed Name Mike Chomiere				Signature Mike Chomiere		Month Day Year 07/09/12	

TRANSPORTER #1



Turnkey Landfill
30 Rochester Neck Rd
Rochester, NH, 03835
Ph: (603) 963-4776

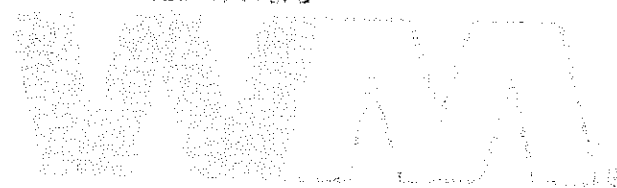
Original
Ticket# 815734

NH200120734
6163-12

Customer Name ENPROSERVICES INC Enpro Services, Carrier ENPRO ENPRO SERVICES
Ticket Date 07/10/2012 Vehicle# 1004 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000352
State Waste Code None Gen EPA ID Not Required
Manifest 20734 PO
Destination Profile 48974000 URBAN FILL (COVER)
Generator NE-USMUNTONHALL University of Maine System

Time	Scale	Operator	Inbound	Gross	
In 07/10/2012 10:01:28	scale 1 inbound	phil bolivert		62300 lb	
Out 07/10/2012 10:32:43	scale 2 outbound	rivera		37360 lb	
				Net	25540 lb
				Tons	12.77

Comments



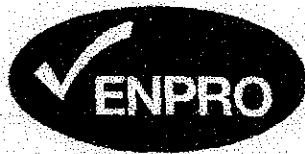
Product	LD%	Qty	UOM	Rate	Fee	Amount	Origin
1 Declassified-Tons- 100		12.77	Tons				ME
2 FUEL-Fuel Surchang 100			%				ME
3 ENV-P-Standard Env 100			%				ME

Total Fees
Total Ticket

SOLID WASTE TRANSPORTER DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature

405WM-Gonic.



SC/004

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NON HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
3. Generator's Name and Mailing Address UNIVERSITY OF SOUTHERN MAINE Campus Drive/University Way GORHAM ME 04038		4. Generator's Phone (207) 228-8124		5. Transporter 1 Company Name ENPRO SERVICES, INC.
6. US EPA ID Number MEX020000000000		7. Transporter 2 Company Name		8. US EPA ID Number
9. Designated Facility Name and Site Address WASTE MANAGEMENT OF NH INC. 90 ROCHESTER NECK ROAD ROCHESTER NH 03839		10. US EPA ID Number DESSWSP05001		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. Urban Fill/soil Contaminated with trace PCB's
12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol
001 CM		0101116		T
15. Additional Descriptions for Materials Listed Above trace PCB cont. not profile approved 486743NH ERGH140		16. Handling Codes for Wastes Listed Above Interim Final		17. State NONE
18. Generator's Instructions and Additional Information ENPRO SERVICES, INC. - 24 HOURS - (800) 966-1102		19. Point of Departure: ENPRO JOB# S163-12		20. State NONE
21. Generator's Certification: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and all applicable state laws and regulations.		22. Printed/Typed Name Patrick Shaw		23. Signature [Signature]
24. Transporter 1 Acknowledgement of Receipt of Materials		25. Printed/Typed Name Mike Chomiere		26. Signature [Signature]
27. Transporter 2 Acknowledgement of Receipt of Materials		28. Printed/Typed Name [Signature]		29. Signature [Signature]
30. Discrepancy Indication Space		31. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 19.		32. Printed/Typed Name [Signature]
33. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in item 19.		34. Printed/Typed Name [Signature]		35. Signature [Signature]

TRANSPORTER #1



Turnkey Landfill
30 Rochester Neck Rd
Rochester, NH, 03839
Ph: (603) 963-4776

Original
Ticket# 815546

6163-12
NH200120732
SC

Customer Name ENPROSVC INC Enpro Services, Carrier ENPRO ENPRO SERVICES
Ticket Date 07/09/2012 Vehicle# 1004 Volume
Payment Type Credit Account Container
Manual Ticket# Driver
Hauling Ticket# Check#
Route Billing # 0000352
State Waste Code None Gen EPA ID Not Required
Manifest 20732 PU
Destination Profile 48974301 (URBAN FILL (COVER))
Generator NE-USM/PTONHALL University of Maine System

Time	Scale	Operator	Inbound	Gross	
In 07/09/2012 11:14:45	scale 1 inbound	phil beisvert		72440 lb	
Out 07/09/2012 11:50:25	scale 2 outbound	driver		35600 lb	
				Net	36840 lb
				Tons	18.42

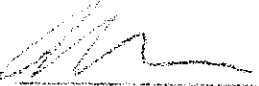
Comments



Product	LO#	Rate	Fee	Amount	Origin
1 Dechlorinated Tonnage 100	18.42 tons				NE
2 FUEL-Fuel Surcharge 100	%				NE
3 EVF-P-Standard Env 100	%				NE

Total Fees
Total Ticket

SOLID WASTE TRANSPORTER DECLARATION: I certify under penalty of perjury that the information provided is true and correct to the best of my knowledge and belief. TO THE BEST OF MY KNOWLEDGE THIS TRUCK CONTAINS NO HAZARDOUS OR UNACCEPTABLE WASTE.

Driver's Signature 

APPENDIX D: AIR MONITORING DATA

Air Monitoring Data: June 20, June 21, and July 9, 2012

Date	Time	Dust Level (mg/m ³)	Temperature (°F)	Weather Conditions	Current Site Activity
6/20/2012 – Background Dust Level @ Upton Hall: 0.021 mg/m³					
6/20/2012	0805	0.021	68	Sunny	Soil Excavation @ Upton Hall
6/20/2012	0905	0.019	70	Sunny	Soil Excavation @ Upton Hall
6/20/2012 – Background Dust Level @ Anderson Hall: 0.020 mg/m³					
6/20/2012	1000	0.072	70	Sunny	Soil Excavation @ Anderson Hall
6/20/2012	1100	0.044	71	Sunny	Soil Excavation @ Anderson Hall
6/20/2012	1200	0.067	75	Sunny	Soil Excavation @ Anderson Hall
6/20/2012	1300	0.020	85	Sunny	Soil Excavation @ Anderson Hall
6/21/2012 – Background Dust Level @ Anderson Hall: 0.017 mg/m³					
6/21/2012	0720	0.043	75	Sunny	Soil Excavation @ Anderson Hall
6/21/2012	0820	0.026	80	Sunny	Soil Excavation @ Anderson Hall
6/21/2012	0920	0.013	80	Sunny	Soil Excavation @ Anderson Hall
6/21/2012	1020	0.012	80	Sunny	Soil Excavation @ Anderson Hall
6/21/2012	1120	0.024	80	Sunny	Soil Excavation @ Anderson Hall
6/21/2012	1220	0.011	80	Sunny	Soil Excavation @ Anderson Hall
6/21/2012	1320	0.024	80	Sunny	Soil Excavation @ Anderson Hall
7/9/2012 – Background Dust Level @ Anderson Hall: 0.003 mg/m³					
7/9/2012	0720	0.027	60	Sunny	Soil Excavation @ Anderson Hall
7/9/2012	0820	0.006	63	Sunny	Soil Excavation @ Anderson Hall
7/9/2012	0920	0.013	65	Sunny	Soil Excavation @ Anderson Hall

APPENDIX E: DATA VALIDATION SUMMARY

USM GORHAM - PROJECT SUMMARY

Analytics Environmental Laboratory Job Numbers: 71292, 73138, 73145, & 73262

A modified Tier II validation was performed on the data. The criteria detailed below were used to qualify the data. Raw data were not used to verify the results reported by the laboratory.

Samples were received at 3.4, 4.2, 4.8, and 5.3 degrees Celsius. No qualifications will be applied.

PCBs:

All polychlorinated biphenyl compound (PCB) samples were extracted and analyzed within technical holding times. No qualifications will be applied.

All PCB surrogates met acceptance criteria. No qualifications will be applied.

The PCB method blanks were non-detect (ND) for all target analytes. No qualifications will be applied.

PCB field blank sample, EB-1 (73145-19), was ND for all target analytes. No qualifications will be applied.

The PCB matrix spike/matrix spike duplicate (MS/MSD) performed on samples AH-CBS-109 (71292-1), AH-CBS-138 (73138-9), and AH-CBS-166 (73262-5) met acceptance criteria (65%-140% for PCB-1016 and 60%-130% for PCB-1260) with the following exceptions:

LAB ID	SAMPLE ID	PCB-1016 (%) MS/MS/MSD/MSD	PCB-1260 (%) MS/MS/MSD/MSD	QUALIFIER
71292-1*	AH-CBS-109	OK/OK/OK/OK	982/774/550/331	None, PCB-1254 interference
73138-9**	AH-CBS-138	NA/NA/NA/NA	NA/NA/NA/NA	None, high PCB-1254 concentration in sample
73262-5***	AH-CBS-166	OK/OK/OK/OK	164/165/241/170	None, PCB-1254 interference

*PCB-1260 RPDs OK/51.5; **Sample spiked with PCB-1254, percent recovery not calculated since sample concentration was high relative to spike concentration; ***PCB-1260 RPDs OK/34.6

The PCB laboratory control sample (LCS)/laboratory control sample duplicate (LCSD) met acceptance criteria. No qualifications will be applied.

No PCB field duplicate samples were submitted with these analytical packages. No qualifications will be applied.

The relative percent difference (RPD) between the column results for all detected PCBs met acceptance criteria ($\leq 25\%$) with the following exceptions:

LAB ID	SAMPLE ID	PCB	RPD	QUALIFIER
71292-1	AH-CBS-109	1254	27.5	J
73138-5	UH-CBS-134	1254	25.3	J
73145-8	AH-CBS-151	1254	28.6	J
73145-18	AH-CBS-161	1254	40.3	J

Some samples were analyzed at dilutions due to the high concentration of PCBs present in the samples and/or due to sample matrix. Elevated quantitation limits are reported in these samples as a result of the dilutions performed.

Data Check, Inc.
P.O. Box 29
81 Meaderboro Road
New Durham, NH 03855

Gloria J. Switalski:
President



Date:

7/31/2012